

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

19-CR-227-V

JOSEPH BONGIOVANNI,

Defendant.

**MOTION TO DISQUALIFY DEFENSE COUNSEL DUE TO ACTUAL CONFLICT
OF INTEREST AND OTHER POTENTIAL CONFLICTS OF INTEREST, AND
REQUEST TO HOLD SCHEDULING ORDER IN ABEYANCE**

The United States of America, by and through its attorney, upon affidavit and exhibit filed separately under seal, James P. Kennedy, Jr., United States Attorney for the Western District of New York, Joseph M. Tripi, Assistant United States Attorney, of counsel, hereby moves the court for an order disqualifying defendant Paul Cambria, Esq. from further representation of defendant Joseph Bongiovanni in this case due to an actual conflict of interest and several other potential conflicts of interest, and further requests that the current Scheduling Order be held in abeyance pending disposition of this motion.

DATED: Buffalo, New York, November 27, 2019.

JAMES P. KENNEDY, JR.
United States Attorney

BY: s/JOSEPH M. TRIPI
Assistant United States Attorney
United States Attorney's Office
Western District of New York
138 Delaware Avenue
Buffalo, New York 14202
716/843-5839
Joseph.Tripi@usdoj.gov